

**UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF IOWA**

In re:

PROPERTY HOLDERS, LTD

,

Debtor.

Chapter 11  
Case No. 22-00744

**STIPULATED MOTION FOR CONTINUATION OF HEARING**

Dupaco Community Credit Union (“Dupaco”), GreenState Credit Union (“GreenState”), and Property Holders, LTD (the “Debtor”), by their undersigned counsel, and Douglas D. Flugum, in his capacity as the Subchapter V Trustee in this bankruptcy proceeding (the “Subchapter V Trustee”) (Dupaco, GreenState, the Debtor, and the Subchapter V Trustee are hereinafter collectively referred to as the “Parties”), hereby jointly move this Court for entry of an order continuing the previously scheduled hearing on the *Joint Motion of Dupaco Community Credit Union and GreenState Credit Union for Relief from the Automatic Stay* (the “Relief from Stay Motion”) and the Debtor’s *Objection to Joint Motion of Dupaco Community Credit Union and GreenState Credit Union for Relief from the Automatic Stay* (the “Objection”) to a date to be determined.

In support of this Motion, the Parties state that they have engaged in preliminary telephonic discussions regarding the Relief from Stay Motion and that they have agreed to arrange and attend an in-person conference among the Parties to further such discussions. The Parties believe that a continuance of the hearing to allow such meeting and discussions to take place could potentially result in a consensual resolution or narrowing of the issues raised in the Relief from Stay Motion, thereby furthering the efficient operation of this Court by reducing or eliminating the amount of

this Court's time that may otherwise be required in order to hear and resolve such issues. The Parties intend to advise this Court as to the outcome of such meeting among the Parties and to request a new hearing date with respect to the Relief from Stay Motion and the Objection, if and to the extent necessary, following such meeting.

WHEREFORE, each of the Parties hereby respectfully requests that this Court (i) continue the hearing on the Relief from Stay Motion and the Objection to a date to be determined, and (ii) grant such other and further relief as this Court deems appropriate.

Dated: July 2, 2024

Respectfully jointly submitted,

DUPACO:

DUPACO COMMUNITY CREDIT UNION

By: /s/ Tonya A. Trumm  
Tonya A. Trumm  
O'CONNOR & THOMAS, P.C.  
1000 Main Street  
Dubuque, IA 52001  
Phone: (563) 557-8400  
Fax: (888) 391-3056  
E-mail: [ttrumm@octhomasslaw.com](mailto:ttrumm@octhomasslaw.com)

Attorneys for Dupaco Community Credit Union

GREENSTATE:

GREENSTATE COMMUNITY CREDIT UNION

By: /s/ Siobhan Briley  
Siobhan Briley  
PUGH HAGAN PRAHM PLC  
425 E. Oakdale Blvd., Suite 201  
Coralville, IA 52241  
Phone: (319) 351-2028  
Fax: (319) 351-1102  
E-mail: [sbriley@pughhagan.com](mailto:sbriley@pughhagan.com)

Attorneys for GreenState Community Credit Union

DEBTOR:

PROPERTY HOLDERS, LTD

By: /s/ Rush M. Shortley  
Rush M. Shortley  
1921 51<sup>st</sup> Street NE  
Cedar Rapids, IA 52402  
Phone: (319) 294-1907  
Fax: (866) 388-4875  
E-mail: [rush@shortleylaw.com](mailto:rush@shortleylaw.com)

Attorney for Property Holders, LTD

SUBCHAPTER V TRUSTEE:

/s/ Douglas D. Flugum  
Douglas D. Flugum  
BUGEYE VENTURES, INC.  
P.O. Box 308  
Cedar Rapids, IA 52406  
Phone: (319) 389-4581  
E-mail: [dflugum@bugeyeventures.com](mailto:dflugum@bugeyeventures.com)

Subchapter V Trustee